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de maximis, inc.

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March 10, 2006

Mr. Peter Mannino   **VIA FAX AND U.S. MAIL**
United States Environmental Protection Agency
New Jersey Remediation Branch
Emergency & Remedial Response Division
290 Broadway, 19th Floor
New York, NY 10007-1866

RE: Cornell-Dubilier Electronics Superfund Site – South Plainfield, NJ
**   OU 3 RI/FS Progress Report No. 7**

Dear Mr. Mannino:

On behalf of Dana Corporation and pursuant to Paragraph 41 of the Administrative Settlement Agreement and Order on Consent ("Settlement Agreement"), enclosed please find Progress Report No. 7. This report covers the period from February 1, 2006 through February 28, 2006.

Very truly yours,

de maximis, inc.

William J. Lee

cc: Gary DiPippo, HydroQual, Inc.
       Michael Last, Esq.
       Mark Nielsen, Environ Corporation
       Bruce Thompson, *de maximis, inc.*
       Lisa Wurster, Esq., Dana Corporation
       Sarah Flanagan, Esq., USEPA Regional Counsel
       MaryLou Parra, NJDEP

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CORNELL-DUBILIER ELECTRONICS SUPERFUND SITE OU 3 RI/FS PROGRESS REPORT NO. 7 February 1, 2006 through February 28, 2006

Description of the Actions Taken Toward Achieving Compliance with the Settlement Agreement Since the Previous Report:

- Submittal of the Remedial Investigation/Feasibility Study (RI/FS) Work Plan on February 3, 2006, in accordance with EPA's prior authorization.

Summary of all Results of Sampling, Tests or Other Data Received or Generated Since the Previous Report:

- None.

Actions Planned Prior to Submittal of Next Two Reports:

- Continue evaluation of well inventory and MWC data.

Percentage Completion:

- Not applicable.

Delays Encountered or Anticipated:

- Concerns remain about possible delays in completion of the well inventory. Available data is in the process of review that will allow identification of data gaps in the inventory, abandonment and/or pumping records necessary to evaluate historical groundwater flow patterns. The adequacy and timing of MWC's response to a specific information request is uncertain.